



Employment Services Standards

Individual

Effective: XXXX, 2019

EMPLOYMENT SERVICES - INDIVIDUAL

The mission of the South Carolina Department of Disabilities and Special Needs (DDSN) is to assist people with disabilities and their families through choice in meeting needs, pursuing possibilities and achieving life goals and minimize the occurrence and reduce the severity of disabilities through prevention. Consistent with the agency's mission, the intent of DDSN Employment Services – Individual is to provide individuals with an Intellectual Disability or a Related Disability (ID/RD), Autism Spectrum Disorder (ASD), Traumatic Brain Injury (TBI), Spinal Cord Injury (SCI), and Similar Disability (SD) the supports needed in order for them to meet their needs, pursue possibilities and achieve their individual life and employment goals.

DEFINITIONS:

As defined by South Carolina's Intellectual Disabilities/Related Disabilities (ID/RD) Waiver and Community Supports (CS) Waiver, Employment Services - Individual consist of intensive, on-going supports that enable individuals for whom competitive employment at or above minimum wage is unlikely absent the provision of supports and who, because of their disabilities, need supports to perform in a regular work setting. Employment services are conducted in a variety of settings, particularly work sites where persons without disabilities are employed and include activities such as supervision and training needed to sustain paid work at or above minimum wage.

As defined by South Carolina's Head and Spinal Cord Injury (HASCI) Waiver, Employment Services are provided in regular competitive employment settings such as factories, offices, stores, restaurants, etc., where people without disabilities are employed. Employment Services provides an intensive or ongoing supports so a HASCI waiver participant for whom competitive employment at or above the minimum wage, is unlikely can perform in a paid work setting. It may include assisting the participant to locate a job or to have a job developed specifically for him or her. The service may be provided in a variety of work settings, particularly sites where persons without disabilities are employed; such as an enclave or a mobile crew, or an individual job placement in the community.

As defined by the United States Department of Health and Human Services, Centers for Medicare and Medicaid Services (CMS), Employment Services are the ongoing supports to individuals who, because of their disabilities, need intensive on-going support to obtain and maintain an individual job in competitive or customized employment, or self-employment, in an integrated work setting in the general workforce for which an individual is compensated at or above the minimum wage, but not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals without disabilities.

As defined by the Workforce Innovation and Opportunity Act (WIOA)¹
Competitive, integrated employment is work that:

- i. Is performed on a full-time or part-time basis (including self-employment) and for which an individual is compensated at a rate that -

- A. Is not less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the rate required under the applicable State or local minimum wage law for the place of employment;
 - B. Is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; and
 - C. In the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and
 - D. Is eligible for the level of benefits provided to other employees; and
- ii. Is at a location -
- A. Typically found in the community (A setting in the competitive labor market. Settings established specifically for the purpose of employing individuals with disabilities are not integrated settings because they are not in the competitive labor market.); and
 - B. Where the employee with a disability interacts for the purpose of performing the duties of the position with other employees within the particular work unit and the entire work site, and, as appropriate to the work performed, other persons (e.g., customers and vendors), who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that employees who are not individuals with disabilities and who are in comparable positions interact with these persons; and
- iii. Presents, as appropriate, opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions.

<http://www.wintac.org/topic-areas/resources-and-strategies-for-competitive-integrated-employment#1cie>

As defined by DDSN Directive 700-07 DD: Employment First:

Employment means working for at least minimum wage in an integrated setting – can be individual (paid directly by the employer), group (paid by a provider from revenues earned via contract with business/government entities) or self-employment (including sole proprietorships and partnerships).

Integrated Setting means a typical workplace where the majority of individuals employed do not have disabilities and where the employee with a disability has opportunities to interact with coworkers, vendors, sub-contractors, customers and/or the public.

MODEL:

Employment Services – Individual are provided at a 1:1 staffing ratio using an Individual Community Placement Model and may include any combination of the following services:

- Vocational/job-related discovery or assessment,
- Person-centered employment planning,
- Job placement,
- Job development,
- Negotiation with prospective employers,
- Job analysis,
- Job carving,
- Training and systematic instruction,
- Job coaching (including developing natural supports),
- Identifying assistive technology,
- Benefits support,
- Training and planning,
- Coordination of transportation,
- Asset development and career advancement services, and
- Other workplace support services including services not specifically related to job skill training that enable the individual to be successful in integrating into the job setting.

Ongoing supports and identification of long term natural supports are imperative for the worker with significant disabilities to participate in competitive employment and to ensure job stabilization and career advancement. Employment Services – Individual may also include support to establish and/or maintain self-employment, including home-based self-employment.

Employment Services – Individual is not designed to provide general skills training to “prepare” individuals for employment in the community. Instead, all supports provided must be directly related to achieving the identified employment goal on the Individual Plan of Supports for Employment (IPSE) with an expected outcome of community integrated employment.

ANTICIPATED OUTCOMES:

It is expected that Employment Services - Individual will support individuals to achieve sustained independent employment, paid at or above minimum wage, in a community integrated employment setting among the general workforce, at a job that meets the individual’s personal and career goals.

It is expected that DDSN Employment Services - Individual be provided in a manner that promotes:

- Dignity and respect.
- Health, safety and well-being.

- Individual and family participation, choice control and responsibility.
- Relationships with family and friends and community connections.
- Personal growth and accomplishments.
- Independence and integration.

It is expected that Employment Services - Individual reflect the principles of DDSN and therefore services should:

- Be person centered.
- Be responsive, efficient, and accountable.
- Be individually focused and strengths-based.
- Maximize potential based on an individual's interests, preferences and choices.
- Be based on best and promising practices.

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Standard		Guidance
1	Employment Services – Individual will be provided in accordance with all state and federal laws.	
2	Employment Services - Individual will be provided in accordance with applicable DDSN Directives, procedures and guidance.	
3	Employment Services - Individual will only be provided by DDSN qualified Employment Services providers.	
4	<p>The Employment Services provider must designate a Program Director who:</p> <ul style="list-style-type: none"> • Is at least 21 years of age; • Has at least a baccalaureate degree from an accredited college or university in the human services or related field and two (2) years of experience in administration or supervision in the human services field or has a master's degree from an accredited college or university in the human services or related field and one (1) year of experience in administration or supervision in the human services field; • Has references from past employment. 	A Program Director may serve more than one program.
5	<p>Employment Services - Individual will be provided by staff who:</p> <ul style="list-style-type: none"> • Are at least 18 years of age; • Have a valid high school diploma or its certified equivalent; • Have references from past employment if the person has a work history; • Are capable of aiding in the activities 	<p>Competency in the following areas may be considered the equivalent to a high school diploma. Staff must be able to:</p> <ol style="list-style-type: none"> a. Read and comprehend written instructions which may include health care information; b. Write and type information sufficient to communicate facts clearly and complete required documentation; c. Communicate verbal or written information effectively to others.

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	<p>of daily living and implementing the Individual Plan of Supports for Employment (IPSE) of each individual for whom they are responsible;</p> <ul style="list-style-type: none"> Have a valid driver's license if duties require transportation of individuals. 	Documentation demonstrating competencies in items a – c must be maintained in the staff's file.
6	Staff must meet requirements for criminal background checks.	<p>Checks must be done in accordance with DDSN Directive 406-04-DD: Criminal Record Checks and Reference Checks of Direct Caregivers:</p> <p>https://ddsn.sc.gov/sites/default/files/Documents/Quality%20Management/Current%20Directives/406-04-DD%20-%20Revised%20%28011817%29.pdf</p>
7	Staff must pass an initial physical exam prior to working in the program.	Pass = No documentation in the physical exam report of conditions present that would jeopardize health and safety of individuals receiving services or staff's ability to perform required duties.
8	Staff must pass initial tuberculosis screening prior to working in the program and annually thereafter.	<p>Pass = no evidence of communicable disease. TB tests must meet requirements of DDSN Directive 603-06-DD: Guidelines for Screening for Tuberculosis which can be found:</p> <p>https://ddsn.sc.gov/sites/default/files/Documents/Quality%20Management/Current%20Directives/603-06-DD%20-%20Revised%20%28102014%29.pdf</p>
9	Staff must be trained and be deemed competent in accordance with DDSN Directives.	<p>DDSN Directive 567-01-DD Employee Orientation, Pre-Service and Annual Training Requirements can be found:</p> <p>https://ddsn.sc.gov/sites/default/files/Documents/Quality%20Management/Current%20Directives/567-01-DD%20-%20Revised%20%28070715%29.pdf</p>
10	There will be a staff development/in-service education program operated by each Employment Services provider which requires all staff to participate in in-service education programs and staff development opportunities in accordance with DDSN Directives.	<p>Staff must periodically be required to demonstrate continuing competency on the most critical information and skills taught in the curriculum. Providers have wide latitude in designing the format of such rechecks.</p> <p>Encouraging staff commitment to continuing personal and professional development will expand the capacity to provide quality service and supports. Staff should routinely be exposed to information regarding training resources and opportunities. Supervisors should be working with staff to identify annual personal and professional goals.</p>

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11	<p>Each Employment Services provider will have written policies on:</p> <ul style="list-style-type: none"> • Use of volunteers and substitutes; • Program evaluation; • Administration of medication; • Admission and discharge of participants; • Personnel practices; • Procedures to be followed when a participant is discovered to be missing; • Keeping and managing a waiting list for those who are seeking entry into each service provided in the program that includes the frequency with which the list will be reviewed. 	
12	<p>Individuals receiving Employment Services - Individual are free from abuse, neglect and exploitation.</p>	<p>DDSN Directive 534-02 DD: Procedures for Preventing and Reporting Abuse, Neglect, or Exploitation of People Receiving Services from DDSN or a Contracted Provider Agency: https://ddsn.sc.gov/sites/default/files/Documents/Quality%20Management/Current%20Directives/534-02-DD%20-%20Revised%20%28012615%29.pdf</p>
13	<p>Individuals receiving Employment Services - Individual are:</p> <ul style="list-style-type: none"> • Informed of their rights • Supported to learn about their rights • Supported to exercise their rights 	<p>Rights include: Human rights, Constitutional rights and Civil rights:</p> <ul style="list-style-type: none"> • Each individual's right to privacy, dignity and confidentiality in all aspects of life is recognized, respected and promoted. • Personal freedoms are not restricted without due process. • Individuals are expected to manage their own funds to the extent of their capability. • Due process is upheld, including the Human Rights Committee review of restriction of personal freedoms.

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		<ul style="list-style-type: none"> Individuals with limited knowledge and experience receive training and opportunities to explore their individual rights and the responsibilities that accompany them. <p>Supports regarding rights and responsibilities provided to individuals receiving Employment Services – Individual must be employment related.</p>
14	<p>Employment Services - Individual will only be provided to those who are authorized by a DDSN qualified Case Manager.</p> <p>Services provided in the absence of an authorization or in excess of the amount (units) authorized are not reimbursable.</p>	<p>Case Managers may only authorize services based on the following authorization schedule:</p> <p>Assessment: 5 units Employment Activities: 70 units</p> <ul style="list-style-type: none"> -Community Based Assessment -Benefits Analysis -Job Development -Coaching -Other (per service definition) <p>Follow Along: 30 units</p> <p>Additional service units may be authorized beyond this authorization schedule based on an assessed need with appropriate justification/documentation.</p> <p>Case Management will provide the chosen Employment Services - Individual provider with an authorization that at a minimum includes the following information:</p> <ul style="list-style-type: none"> Worker information: name, address, DOB, referral date, SS#, Medicaid # (when applicable), emergency contact information, and name with contact information of referring Case Manager; Type of service authorized, number of authorized units, effective date of the authorization and the expiration date of the authorization; Additional information: Critical and emergency information, relevant health/medical information, and care and supervision information.

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		<p>All employment documentation (Comprehensive Vocational Services Assessment, Individual Plan of Supports for Employment and the ISP/SC Individual Employment Log) must be available in Therap for review by the Case Manager.</p> <p>Most people with disabilities can be successfully employed through the utilization of traditional supported employment strategies. Traditional supported employment strategies are employed as the model for DDSN Employment Services - Individual and outlined in the “Model” section of this document (pg.4).</p> <p>When traditional supported employment strategies (which may include but are not limited to advocacy, person-focused assessment, job development, job carving, assistive technology, job modifications, natural supports, behavioral training, job coaching and self-employment) have been appropriately implemented, but do not result in a positive employment outcome for the person, formal “Customized Employment” strategies may be appropriate and necessary. The need for formal “Customized Employment” including, but not limited to, in-depth discovery, can only be demonstrated when the traditional supported employment model has been appropriately implemented and demonstrated to be ineffective for the person supported.</p>
15	<p>Individuals receiving Employment Services - Individual are supported to make decisions and exercise choice regarding their work.</p>	<p>Decisions and choices made by the individual related to employment must be documented in the Comprehensive Vocational Service Assessment, Individual Plan of Supports for Employment (IPSE) and/or ISP/SC Individual Employment Log.</p>
16	<p>Within 15 business days of receipt of a referral/authorization, the Employment Services provider will make available to the referring Case Manager:</p> <ul style="list-style-type: none"> • Confirmation of acceptance into the service with start date; 	<p>An Initial Interview must be conducted to explain independent competitive integrated employment and its benefits. Participants must understand the scope of Employment Services – Individual to include fading through natural supports and/or assistive technology.</p>

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	<ul style="list-style-type: none"> Information that the individual will be placed on the provider's waiting list; or Information that the referral is being rejected with reason for rejection. 	<p>If the referral is rejected, an explanation must be documented and be available to the Case Manager.</p> <p>Determining an individual is not "ready" for employment should not be a reason for rejection of the referral. All individuals referred should be given the opportunity to try employment.</p>
17	<p>Within 30 calendar days of the service start date, the Comprehensive Vocational Service Assessment will be completed that identifies the abilities/strengths, interests/preferences, paid and unpaid work experience and needs/supports of the individual in the following areas:</p> <ul style="list-style-type: none"> Self-Advocacy/Self Determination; Self-Esteem; Coping Skills; Personal Responsibility; Personal Health and Hygiene; Socialization; Community Participation; Mobility and Transportation; Community Safety; Money Management; Pre-Employment; Job Search; Communication; Skills; Supports. 	<p>Annual assessments are not required.</p> <p>It is suggested that Employment Services providers secure information regarding legal guardianship and criminal history if applicable.</p> <p>All employment documentation (Comprehensive Vocational Services Assessment, Individual Plan of Supports for Employment and the ISP/SC Individual Employment Log) must be available in Therap for review by the Case Manager.</p>

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18	<p>Based on the results of the Comprehensive Vocational Service Assessment, within 30 calendar days of the service start date, an Individual Plan of Supports for Employment (IPSE) is developed by the Program Director or his/her designee with participation from the individual and/or his/her legal guardian.</p>	<p>The IPSE is designed to be a working document and annual plans are not required. The ISP/SC Individual Employment Log is designed to provide an ongoing account of activities, demonstrating progression toward independent competitive integrated employment.</p> <p>Centers for Medicare/Medicaid Services (CMS) Home and Community Based Services Final Rule:</p> <p>A person-centered service plan will assist the individual in achieving personally defined outcomes in the most integrated community setting, ensure delivery of services in a manner that reflects personal preferences and choices and contribute to the assurance of health and welfare.</p> <p>https://www.cms.gov/Newsroom/MediaReleaseDatabase/Fact-sheets/2014-Fact-sheets-items/2014-01-10-2.html</p>
19	<p>The plan must include:</p> <ul style="list-style-type: none"> • The Employment Goal specific to the individual, based on their interests, preferences, strengths, and experience, with the expected outcome of sustained independent employment, at or above minimum wage, in a community integrated setting among the general workforce, at a job that meets the individual's personal and career goals; • A description of objectives/activities identified to support the employment outcome; • Type and frequency of supervision needed based on assessment; • Emergency contact information; • Relevant medical information; • Any information necessary to support the person in an employment setting. 	<p>Objectives/activities must focus on the individual's abilities/strengths, interests/preferences, and needs/supports with the expected outcome of independent competitive integrated employment.</p> <p>Strategies may include the use of job duty, task analyses, assistive technology, natural supports, prompting procedures, and reinforcement and self-management procedures. These objectives/activities are provided in a least intrusive method of support.</p> <p>During the job development phase of Employment Services – Individual, the individual must be supported/assisted to arrange for his/her transportation to/from work. Assisting/supporting to arrange for transportation is the responsibility of the Employment Services – Individual provider. Transporting the individual to/from work is not the responsibility of the Employment Services – Individual provider.</p> <p>All critical and emergency information for this individual must be documented in the plan.</p> <p>Known medications taken by the individual must be listed and any assistance of medicating must be documented (self-medicate or assisted medicate). All</p>

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		<p>known relevant medication information must be documented including specific instructions concerning individual reactions, side effects or restrictions to medicine must be documented.</p> <p>DDSN Directive 510-01 DD: Supervision of People Receiving Services:</p> <p>Services provided shall include the provision of any interventions and supervision needed by the person which include dinning/eating.</p> <ul style="list-style-type: none"> • The supervision to be provided must be based on assessed needs. • The Employment Services provider will provide supervision, however will not serve as the employer of record or supervisor of individuals in their employment situation. Individuals in employment situations will maintain a natural employee/employer relationship with their employer. <p>https://ddsn.sc.gov/sites/default/files/Documents/Quality%20Management/Current%20Directives/510-01-DD%20-%20Revised%20%28083117%29.pdf</p> <p>All employment documentation (Comprehensive Vocational Services Assessment, Individual Plan of Supports for Employment and the ISP/SC Individual Employment Log) must be available in Therap for review by the Case Manager.</p>
20	The objectives/activities in the plan must support the provision of Employment Services - Individual as defined in these standards.	<p>Goals/objectives/activities designed to prepare individuals for competitive, integrated employment are not reimbursable as Employment Services – Individual. Examples of employment preparation goals/objectives/activities include, but are not limited to:</p> <ul style="list-style-type: none"> • Numerous community based assessments that are not individualized and not focused on the individual's employment goal;

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		<ul style="list-style-type: none"> • Interviewing skills training not focused on a scheduled interview; • Simulated work outside of a natural work setting; • Computer skills training with the sole objective to complete applications.
21	As soon as the plan is developed, it must be implemented.	
22	<p>When independent competitive integrated employment is secured for the individual, details regarding this job placement must be documented to include:</p> <ul style="list-style-type: none"> • Start date; • Employer; • Location (address); • Wage; • Hours per week (schedule); • Transportation arrangements; • Wage reporting responsibility; • When the job ends, the end date and reason. 	<p>A Record of Employment must be completed for each position secured. For each additional position, a new Record of Employment must be completed.</p> <p>All employment documentation (Comprehensive Vocational Services Assessment, Individual Plan of Supports for Employment and the ISP/SC Individual Employment Log) must be available in Therap for review by the Case Manager.</p>
23	Upon job placement, if the individual receives Social Security benefits or other government assistance, the plan for reporting wages to the appropriate agency(s) must be documented to ensure the best interests of the individual are served.	<p>Documentation must be completed on the Record of Employment in the IPSE.</p> <p>Examples of assistance provided in the management of monies may include:</p> <ul style="list-style-type: none"> • Ensuring wages are reported to SSA (if necessary); • Annual income taxes; and/or • Other earned income related responsibilities.
24	Upon job placement, a strategy for coaching to include fading through natural supports or assistive technology is developed. Minimal, long term supports to assist with maintaining the job,	It is expected that Employment Services – Individual will be needed throughout the individual’s career. Once stable on the job, follow along services will be provided until these are no longer desired/needed.

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	employee/employer satisfaction, facilitating advancement, wage reporting and general monitoring are available based on need.	
25	<p>Documentation of activities directly related to achieving independent competitive employment must be entered into the ISP/SC Individual Employment Log to support each unit of service reported.</p> <p>Documentation must include:</p> <ul style="list-style-type: none"> • The date of the activity; • Time in/time out for each activity (exact times); • Contact type; • The location of the activity; • With whom the activity took place; • And a detailed description of the activity. 	<p>For each unit of service reported, documentation must be present to show the service was provided at a 1:1 staffing ratio on the day the service was reported.</p> <p>All employment documentation (Comprehensive Vocational Services Assessment, Individual Plan of Supports for Employment and the ISP/SC Individual Employment Log) must be available in Therap for review by the Case Manager.</p>
26	The Program Director or his/her designee must ensure that all billable units of Employment Services – Individual are entered into the Day Supports Attendance Log (DSAL) by the fifth business day of the following month.	<p>The Day Supports Attendance Log (DSAL) is located on the DDSN Application Portal.</p> <p>Failure to enter units of service delivered into DSAL within by the established deadline may result in nonpayment.</p> <p>While any staff member may enter information into DSAL. However, if the entry is not completed by the Program Director or his/her designee, the documentation must be present indicating the Program Directors’/designee’s review of the information. This documentation can be noted in the log; or a clinician report can be run and saved with progress status and comments entered.</p>
27	<p>Documentation must be:</p> <ul style="list-style-type: none"> • True and accurate; 	Electronic entries, initials and/or signatures on the ISP/SC Individual Employment Log are sufficient.

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	<ul style="list-style-type: none"> • Complete; • Logically sequenced; • Typed or handwritten in permanent dark ink; and • Dated and signed by the person making the entry. 	
28	At least monthly, the plan is monitored by the Program Director or his/her designee to determine its effectiveness in achieving the individual's employment goal.	<p>The Program Director or his/her designee will monitor the plan monthly by review of the ISP/SC Individual Employment Log.</p> <p>Electronic entries, initials and/or signatures on the ISP/SC Individual Employment Log are sufficient.</p>
29	The plan is amended when changes to the plan are necessary with participation from the individual and/or his/her legal guardian.	<p>Changes may include, but are not limited to:</p> <ul style="list-style-type: none"> • Goals/objectives/activities are no longer appropriate; • Goals/objectives/activities no longer support progress; and/or • The individual's employment goal or life situation has changed. <p>Amendments are documented on the ISP/SC Individual Employment Log with notation of the individual's and/or his/her legal guardian's participation and agreement.</p>
30	<p>If termination of Employment Services – Individual is being considered, an exit interview is conducted to discuss termination.</p> <p>The results of the exit interview are documented and must be available to the individual's Case Manager within five (5) business days of the interview.</p>	<p>An exit interview is conducted when an individual no longer wants the service, relocates, chooses another Employment Services provider for supports, is admitted to a nursing home, moves into a correctional facility, or refuses to cooperate with the terms listed in the Partnership Agreement - Terms and Conditions. An exit interview must be conducted prior to termination of Employment Services - Individual which includes notation of the reason for termination and includes the individual's signature. If an exit interview and/or signature is not possible, notation on the exit interview form must be made explaining the need to terminate service and the reason an interview/signature is not possible.</p>
31	A record shall be maintained for each individual, which contains, at a minimum,	Record of illnesses and accidents will be maintained for those accidents that occur during service provision

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	<p>the items listed below. All documents and entries shall be legible, dated, and signed by the person making the entry. If symbols are used, explanatory legends must be provided.</p> <ul style="list-style-type: none"> • Comprehensive Vocational Service Assessment; • Individual Plan of Supports for Employment (IPSE); • Record of Employment; • ISP/SC Individual Employment Log that supports the provision of Employment Services - Individual; Record of unusual behavior incidents which are recorded at the time of occurrence; • Record of illness and accidents; • Record of critical incidents. 	<p>and for illnesses made known to the Employment Services provider.</p>
32	<p>Reporting requirements are performed per DDSN policies and Directives.</p>	<p>Including, but not limited to:</p> <ul style="list-style-type: none"> • DDSN Directive 100-09 DD: Critical Incident Reporting https://ddsn.sc.gov/sites/default/files/Documents/Quality%20Management/Current%20Directives/100-09-DD%20-%20Revised%20%28110117%29.pdf • DDSN Directive 505-02 DD: Death or Impending Death of Persons Receiving Services from DDSN https://ddsn.sc.gov/sites/default/files/Documents/Quality%20Management/Current%20Directives/505-02-DD%20-%20Revised%20%28020217%29.pdf • DDSN Directive 534-02 DD: Procedures for Preventing and Reporting Abuse, Neglect, or Exploitation of People Receiving Services from DDSN or a Contracted Provider Agency https://ddsn.sc.gov/sites/default/files/Documents/Quality%20Management/Current%20Directives/534-02-DD%20-%20Revised%20%28012615%29.pdf